

UNITED STATES OF AMERICA	*	CRIMINAL NO. 09-043
VERSUS	*	SECTION: "C"
GERONIMO A. CELLAMARE	*	
	*	*

Should this matter have gone to trial, the Government would have proved, through the introduction of competent testimony and admissible tangible exhibits, the following facts, beyond a reasonable doubt, to support the allegations in the Bill of Information now pending against the defendant, GERONIMO A. CELLAMARE. The defendant has agreed to plead guilty to Count One of a Bill of Information charging the defendant with a violation of Title 18, United States Code, Section 1703(a) relative to felony delay of the United States mail.

On October 3, 2008, a search warrant was executed at the residency of the defendant, GERONIMO A. CELLAMARE, located in Westwego, Louisiana, in the Eastern District of Louisiana by United States Postal Inspectors. Upon searching the defendant's apartment, the United States Postal Inspectors found 829 pieces of First Class mail, 57 pieces of Second Class

mail, 921 pieces of Presorted-Standard Political mail, 732 pieces of Standard mail, and 412 pieces of ADVO advertisement mail. The mail was seized by postal inspectors and taken to their offices.

A supervisor for the United States Postal Services, Westwego Post Office, would testify that the defendant, GERONIMO A. CELLAMARE, was a United States Postal Service Transitional Employee city letter carrier during the months of September and October, 2008. The supervisor would testify the addresses on the mail seized from the defendant's apartment on October 3, 2008, was United States mail assigned to him for delivery and should have been delivered by the defendant on mail routes that he was assigned to during that period of time. Additionally, the supervisor would state all of the mail found at his apartment was addressed to more than 250 individuals, organizations, or companies who should have received this mail. The supervisor would further state all of the United States mail described above was entrusted to GERONIMO A. CELLAMARE in his capacity as a United States Postal Service letter carrier and it should have been conveyed and delivered to the addresses stated on the mail therein without any delay. The defendant was not authorized to detain or retain any United States mail in his personal possession for any reason.

An individual will testify that he/she confronted the defendant concerning his failure to deliver the mail described above and the defendant stated to him/her that he was tired and could not deliver all his mail so he brought the mail to his apartment.

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GERONIMO A. CELLAMARE
Defendant

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